

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:20-cr-255
)	
Plaintiff,)	JUDGE SARA LIOI
-vs-)	
)	<u>EMERGENCY</u>
JOHN GEORGE MEDAS,)	<u>MOTION TO EXTEND TIME FOR</u>
)	<u>SELF SURRENDER TO INCARCERATION</u>
Defendant.)	<u>DUE TO SERIOUS MEDICAL CONDITION</u>
)	<u>AND TO DETERMINE AVAILABILITY</u>
)	<u>OF TREATMENT BY BOP</u>

Now comes the Defendant, John Medas, by and through the undersigned counsel and respectfully Motions the court for an extension of time for him to self-report for service of his sentence herein. Currently he has been advised that he was to turn himself in MONDAY FEBRUARY 13, 2023.

It is now respectfully requested that this court grant a reasonable extension of time for him to self-report to permit his current treatment for a life-threatening medical condition and to permit time to determine if the Bureau of Prisons (BOP) can accommodate his ongoing treatment.

As grounds for this request, it is respectfully submitted:

1. The undersigned counsel received a letter late last night from Anthony Mastroianni, JD, MD.
2. The letter from Dr. Mastroianni details Mr. Medas current condition and treatment with the suggestion that treatment could be completed mid-late March, 2023.
3. That counsel would like to transmit the letter of Dr. Mastroianni off public docket to the Court and United States Attorney and later file it under seal with leave of Court, if permitted to do so.

4. As the letter of Dr. Mastroianni indicates, this request is not made for purposes other than treatment of his current medical condition and to only delay reporting to prison to give Mr. Medas a chance for a cure.

The Defendant also respectfully suggests that if the Court is not inclined to grant an extension of the report date for the above reasons, that at least a brief extension be granted to allow the BOP to determine where he can receive appropriate care without unnecessary delay in treatment which may be detrimental to his condition.

WHEREFORE, the defendant respectfully requests a reasonable amount of time to self-report herein beyond February 13, 2023.

Respectfully submitted,

/s/ Robert A. Dixon

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed electronically this 9th day of February, 2023. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Robert A. Dixon

ROBERT A. DIXON

Attorney for Defendant